

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION
CORPORATION,**

Plaintiff-Applicant,

v.

**BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,**

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,**

Adv. Pro. No. 10-04272 (SMB)

Plaintiff,

v.

JEROME O'HARA,

BERNADETTE O'HARA,

O'HARA FAMILY PARTNERSHIP,

ELIZABETH SARRO,

GEORGE PEREZ, and

JEANETTE PEREZ,

Defendants.

**STIPULATION AND ORDER FOR EXTENSION OF TIME TO
RESPOND AND TO ADJOURN THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Defendants Jerome O'Hara ("O'Hara"), Bernadette O'Hara, George Perez ("Perez"), and Jeanette Perez (collectively, "Defendants") may move, answer, or otherwise

respond to the Trustee's complaint (the "Complaint") is extended up to and including July 15, 2015. The pre-trial conference will be adjourned to September 23, 2015, at 10:00 a.m.

On or about March 17, 2010, the United States filed indictment 10 Cr. 228 (LTS) in the United States District Court for the Southern District of New York charging O'Hara and Perez with conspiracy to commit securities fraud, falsify records of a broker-dealer, and falsify records of an investment advisor, in violation of 18 U.S.C. § 371; falsifying records of a broker-dealer, in violation of 15 U.S.C. §§ 78(a) and 78ff, 17 C.F.R. § 240.17a-3, and 18 U.S.C. § 2; and falsifying records of an investment advisor, in violation of 15 U.S.C. §§ 80b-4 and 80b-17, 17 C.F.R. § 275.204-2, and 18 U.S.C. § 2 (the "Criminal Case").

On November 19, 2010, the Trustee commenced an adversary proceeding, styled *Picard v. O'Hara et al.*, Adv. Proc. No. 10-04272 (BRL), by filing the Complaint in the United States Bankruptcy Court for the Southern District of New York against Defendants. Counsel for O'Hara and Perez requested a stay of the adversary proceeding pending resolution of the Criminal Case.

The purpose of this stipulated extension ("Stipulation") is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of Defendants' right to request from the Court a further extension of time to answer, move against, or otherwise respond and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction. Upon notice to Defendants, nothing in this Stipulation waives the Trustee's right to request from the Court an order to

require Defendants to answer, move against, or otherwise respond to the Complaint and to attend a pre-trial conference prior to September 23, 2015.

Dated: April 15, 2015
New York, New York

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Keith R. Murphy
Email: kmurphy@bakerlaw.com
Ona T. Wang
Email: owang@bakerlaw.com

*Attorneys for Plaintiff Irving R. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

THE LAW OFFICES OF GORDON MEHLER, PLLC

By: /s/ Gordon Mehler
747 Third Avenue, 32nd Floor
New York, New York 10017
Telephone: (212) 661-2414
Facsimile: (212) 661-8761
Gordon Mehler
Email: gmehler@mehlerlaw.com

*Attorneys for Defendants Jerome O'Hara and
Bernadette O'Hara*

KRANTZ & BERMAN, LLP

By: /s/ Larry H. Krantz
747 Third Avenue, 32nd Floor
New York, New York 10017
Telephone: (212) 661-0009
Facsimile: (212) 355-5009
Larry H. Krantz
Email: lkrantz@krantzberman.com

*Attorneys for Defendants George Perez and
Jeanette Perez*

SO ORDERED

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Dated: April 17th, 2015
New York, New York